

Appl. No. 10/698,773

Amdt. Dated June 3, 2005

Reply to Office Action of March 8, 2005

### REMARKS

This is a full and timely response to the non-final Office action mailed March 8, 2005. Reexamination and reconsideration in view of the foregoing amendments and following remarks is respectfully solicited.

#### Specification

In the office action, the Examiner objected to the specification for a grammatical error in the Abstract and a typographical error in paragraph 0029. In the above amendments to the specification Applicants have amended the Abstract and paragraph 0029 to correct the errors. Applicants thus request that the objection be withdrawn.

#### Claim Objections

In the office action, the Examiner objected to claim 10 for a grammatical error in line 2. In the above amendments Applicants have amended claim 10 to correct the error. Applicants thus request that the objection be withdrawn.

The Examiner also objected to claim 17 for lacking sufficient antecedent basis for the limitation "the first channel". Accordingly, applicants have amended claim 17 to recite "the channel" as suggested by the Examiner. Applicants thus request that the objection be withdrawn.

#### Rejections Under 35 U.S.C. § 102

Claims 1-3 were rejected under 35 U.S.C. § 102 as allegedly being anticipated by U.S. Patent No. 5,143,433 to Farrell. This rejection is respectfully traversed. First, applicants note that the claimed invention is directed toward a lamp system that includes a first lamp and a second lamp. The first lamp includes a "first coupling aperture". The second lamp includes "a second coupling aperture proximate the first coupling aperture" such that "light from the second lamp can pass to the first lamp through the first coupling aperture and the second coupling aperture". As described in applicants' specification,

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such an arrangement can facilitate the use of second lamp as a backup for the first lamp, and thus provides additional redundancy that can improve the reliability of a display system. See paragraph [0014] of applicants' specification.

In the office action, the Examiner cited elements 16, 18 and 20 in FIG. 9 as comprising the first lamp, and elements 23 and 37 as comprising the second lamp. Then the examiner cited the top side of element 23 in FIG. 9 as comprising the first coupling aperture, and the bottom side of element 23 as the second coupling aperture.

Applicants submit that this is a mischaracterization of the Farrell reference, and that the Ferrell reference fails to teach the claimed invention. Applicants first note that that element 18 of Ferrell is described as a "primary fluorescent tube 18" and thus comprises the first lamp, while element 37 is described as a "secondary fluorescent tube 37" and thus comprises the second lamp. Element 16 is described as a diffuser plate between the primary fluorescent tube 18 and the LCD panel 12. Element 20 is described as a reflective surface of reflector body 24. See column 4, line 45 to column 5, line 11 of Farrell.

Next, applicants note that claim 1 clearly recites that "the first lamp **including** . . . a first coupling aperture". Second, claim 1 clearly recites "the second lamp **including** . . . a second coupling aperture". Thus, claim 1 clearly recites that the first coupling aperture is part of the first lamp, and the second coupling aperture is part of the second lamp, where light can pass from the second lamp to the first lamp through the first and second coupling apertures.

In contrast, the "slots 23" in Farrell are not part of the "primary fluorescent tube 18" or the "secondary fluorescent tube 37". Instead, the slots 23 are cut through the reflector body 24. See FIG. 9, and column 5, lines 12-13. Because the slots 23 are cut in the reflector body, and are not part of the fluorescent tube 18 or fluorescent tube 37, they clearly do not meet the limitations of claim 1. Thus, Farrell fails to teach the limitation of

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“the first lamp **including** . . . a first coupling aperture” and “the second lamp **including** . . . a second coupling aperture”.

It should be further noted that Ferrell is not designed to provide any additionally redundancy. Instead, the “second fluorescent tubes 37 are used to provide a lower level of light for use in low ambient situations. As such, the lamp system of Ferrell is not designed to have light flow from inside one lamp to inside the second lamp such that the second lamp can be used to provide redundancy for the first lamp.

For all these reasons, applicants respectfully submit that independent claim 1 is patentably distinct over the cited references. Furthermore, as claims 2-10 depend from, and include all the limitations of independent claim 1, they are also submitted to be patentably distinct.

Claims 11-12, 15, 17 and 20 were similarly rejected under 35 U.S.C. § 102 as allegedly being anticipated by U.S. Patent No. 5,143,433 to Farrell. Applicants likewise submit that claims 11 and 17 are patentably distinct over Farrell for the same reasons given with respect to claim 1 above.

Furthermore, applicants have amended independent claim 11 to further distinguish over the cited reference. **These amendments further clarify that the first aperture is part of the first tubular lamp and that the second aperture is part of the second tubular lamp.** Specifically, amended independent claim 11 recites the first tubular lamp includes “a first reflective coating on a first surface of the first tubular lamp” and where “the exit aperture and the first coupling aperture comprise a portion of the first surface where the first reflective coating is not present”. Likewise, the amendments clarify that the second tubular lamp includes “a second reflective coating on a second surface of the second tubular lamp” and where “the second coupling aperture comprises a portion of the second surface where the second reflective coating is not present”.

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Thus, because Farrell fails to disclose a first lamp including a first coupling aperture and a second lamp including a second coupling aperture, amended independent claim 11 is patentably distinct over the cited reference. Furthermore, as claims 12-16 depend from, and include all the limitations of independent claim 11, they are also submitted to be patentably distinct.

Likewise, applicants have amended independent claim 17 to further distinguish over the cited reference. **These amendments further clarify that the first aperture is part of the first tubular lamp.** Specifically, amended claim 17 recites the first tubular lamp includes "a first reflective coating on a first surface of the first tubular lamp" and where "the exit aperture and the first coupling aperture comprise a portion of the first surface where the first reflective coating is not present".

Thus, because Farrell fails to disclose a first lamp including a first coupling aperture, amended independent claim 17 is patentably distinct over the cited reference. Furthermore, as claims 18-20 depend from, and include all the limitations of independent claim 17, they are also submitted to be patentably distinct.

The dependent claims are also submitted to be patentable for the reasons given above with respect to the independent claims and because each recite features which are patentable in its own right. Individual consideration of the dependent claims is respectfully solicited. For example, dependent claims 12 and 18 now recite a phosphor coating formed on the reflective coating, where the reflective coating is not present at the coupling aperture. These claims further define the relationship between the lamps and their coupling apertures in a way that is not found in the cited references.

With regard to claim 16, applicants submit that the Examiner failed to provide a prima facie case of obviousness. In this rejection, the Examiner stated that "rearranging parts of an invention involves only routine skill in the art", citing *in re Japiske*, 86 USPQ 70. Applicants respectfully disagree, and note that claim 16 recites the specific formation

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of phosphor coatings to form the first and second coupling apertures. Applicants submit that this is not merely "rearranging parts" when coupling apertures are formed using the selective presence of phosphor on the interior of surfaces of the lamp, especially when none of the cited references show any sort of coupling apertures formed on the lamps themselves.

### Conclusion

Applicants submit that the present application is in condition for allowance. Favorable reconsideration and withdrawal of the objections and rejections set forth in the above-noted Office Action, and an early Notice of Allowance are requested.

If the Examiner has any comments or suggestions that could place this application in even better form, the Examiner is requested to telephone the undersigned attorney at the below-listed number.

If for some reason Applicant has not paid a sufficient fee for this response, please consider this as authorization to charge Ingrassia, Fisher & Lorenz, Deposit Account No. 50-2091 for any fee which may be due.

Respectfully submitted,

INGRASSIA FISHER & LORENZ

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